

MORRIS LAW GROUP  
 Steve Morris, Bar No. 1543  
 Rosa Solis-Rainey, Bar No. 7921  
 411 E. Bonneville Ave., Ste. 360  
 Las Vegas, Nevada 89101  
 Telephone: (702) 474-9400  
 Facsimile: (702) 474-9422  
 Email: [sm@morrislawgroup.com](mailto:sm@morrislawgroup.com)  
 Email: [rsr@morrislawgroup.com](mailto:rsr@morrislawgroup.com)

HALLETT & PERRIN  
 Michael S. Alfred (*pro hac vice*)  
 1445 Ross Ave, Suite 2400  
 Dallas Texas 75202  
 Email: [malfred@hallettperrin.com](mailto:malfred@hallettperrin.com)

*Attorneys for Plaintiff*  
 SUSTAINABLE MODULAR MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use and benefit of SUSTAINABLE MODULAR MANAGEMENT, INC., a Texas corporation	)	Case No. 2:20-cv-00790-JAD-NJK
	)	
Plaintiff,	)	<b>PLAINTIFF'S UNOPPOSED</b>
v.	)	<b>MOTION FOR EXTENSION OF</b>
	)	<b>TIME TO ANSWER JE DUNN'S</b>
	)	<b>COUNTERCLAIM</b>
JE DUNN CONSTRUCTION COMPANY; FEDERAL INSURANCE COMPANY; HARTFORD FIRE INSURANCE COMPANY; TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA; DOE Individuals I-X and ROE Entities I-X, inclusive,	)	
	)	
Defendants.	)	<b>FIRST REQUEST</b>

UNITED STATES OF AMERICA, for the use and benefit of  
 SUSTAINABLE MODULAR MANAGEMENT, INC. ("Plaintiff" or "SMM")

1 files its Unopposed Motion to Extend Time to Answer JE Dunn  
2 Construction Company's ("JE Dunn") Counterclaim (the "Counterclaim"),  
3 and in support thereof, would respectfully state as follows:

4 1. Plaintiff's answer to the Counterclaim (Dkt. 25) is currently due  
5 on July 22, 2020.

6 2. Plaintiff requested a short extension to its deadline to answer JE  
7 Dunn's Counterclaim due to the heavy workload of SMM's counsel and  
8 upcoming filing deadlines and hearings.

9 3. JE Dunn granted the extension and authorized the undersigned  
10 counsel to represent that it is not opposed to this request for an extension  
11 of time.

12 4. Accordingly, Plaintiff respectfully requests an extension of time  
13 until and including July 29, 2020 to respond to the Counterclaim.

14 MORRIS LAW GROUP

15 By: /s/ MICHAEL S. ALFRED

16 Steve Morris, Bar No. 1543  
17 Rosa Solis-Rainey, Bar No. 7921  
18 411 E. Bonneville Ave., Ste. 360  
19 Las Vegas, Nevada 89101

20 HALLETT & PERRIN  
21 Michael S. Alfred (*pro hac vice*)  
22 1445 Ross Ave, Suite 2400  
23 Dallas, Texas 75202  
24 Email: [malfred@hallettperrin.com](mailto:malfred@hallettperrin.com)

25 *Attorneys for Plaintiff*  
26 SUSTAINABLE MODULAR  
27 MANAGEMENT, INC.

28 **NO FURTHER EXTENSIONS  
WILL BE GRANTED.**

IT IS SO ORDERED.

Dated: July 23, 2020

·  
·  
·

United States Magistrate Judge